

To: NADDY, JOHN[JNADDY@idem.IN.gov]
Cc: rjean@idem.in.gov[rjean@idem.in.gov]
From: Lee, Jae
Sent: Wed 6/14/2017 3:49:10 PM
Subject: RE: Subpart AA applicability to Tradebe

I think it was a more broad question whether the SDS (the RCRA permit exempted recycling unit) would be still subjected to the Subpart AA, BB, and/or CC requirements. Since State RCRA permit has AA, BB, and CC requirements, I was wondering whether the Air Emission Standards are still applicable to the SDS and its attached units (equipment).

Tradebe can use CAA to comply of the RCRA's Subpart AA requirements. BB is also same issue. If Tradebe determined to comply with CAA rather than RCRA, then they need to certify.

Jae

From: NADDY, JOHN [mailto:JNADDY@idem.IN.gov]
Sent: Wednesday, June 14, 2017 10:20 AM
To: Lee, Jae <lee.jae@epa.gov>
Cc: rjean@idem.in.gov
Subject: RE: Subpart AA applicability to Tradebe

Jae-

Questions:

- Is this what you asked back on the May 31st when we discussed the applicability of Subpart AA if the process unit is addressed under the CAA?
- If the Subpart AA requirement is not applicable under 40 CFR 264.1030(e) [for permitted facilities], why would you be looking for it in a RCRA permit?

John Naddy
 Technical Environmental Specialist
 Compliance and Response Branch
 Office of Land Quality
 Indiana Department of Environmental Management
 317-233-0404

From: JEAN, RUTH
Sent: Wednesday, June 14, 2017 11:01 AM
To: Lee, Jae <lee.jae@epa.gov>
Cc: NADDY, JOHN <JNADDY@idem.IN.gov>; TEAGUE, JEFF <JTEAGUE@idem.IN.gov>
Subject: RE: Subpart AA applicability to Tradebe

The SDS is not permitted, so this would not be in the permit.

John, Can you answer Jae's question regarding applicability of Subpart AA?

From: Lee, Jae [mailto:lee.jae@epa.gov]
Sent: Tuesday, June 13, 2017 10:59 AM
To: JEAN, RUTH <RJEAN@idem.IN.gov>
Subject: Subpart AA applicability to Tradebe

Ruth,

Someone asked me about the applicability of Subpart AA (Process Vent) to Tradebe's distillation units.

For the Subpart AA application to Tradebe's process vent, the draft permit Section 5 references to Appendix D-15. But the Appendix D-15 only discusses BB and CC.

Where can I find AA description?

Jae